

# Federal Defenders OF NEW YORK, INC.

Southern District  
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January 4, 2024

## **BY ECF AND EMAIL**

The Honorable Andrew L. Carter, Jr.  
United States District Judge  
Southern District of New York  
40 Foley Square  
New York, NY 10007

USDC SDNY  
DOCUMENT  
ELECTRONICALLY FILED  
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**Re: United States v. Luis Garcia,  
23 Cr. 604 (ALC)**

Dear Judge Carter:

I write to request that the Court modify Mr. Garcia's bail conditions by replacing the current curfew condition with standalone GPS monitoring.

A curfew is no longer appropriate both because of Mr. Garcia's track record of compliance with Pretrial supervision and because of his overtime employment. Mr. Garcia is currently working two jobs—at the juice bar and the cruise ship—to provide for his large family and often comes home at 11:00 p.m. or later. The curfew is therefore not adding much to his supervision beyond what standalone GPS monitoring would provide. But the curfew conditions prevents Mr. Garcia from working additional available evening custodial shifts at the cruise ship to earn more money.

Pretrial Services has no objection to this request. The government defers to Pretrial Services.

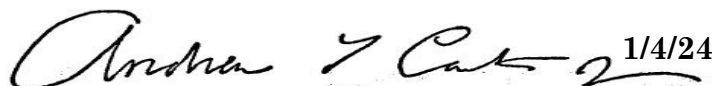
Respectfully submitted,

/s/ \_\_\_\_\_  
Clay H. Kaminsky  
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cc: AUSA Jaclyn Delligatti  
USPSO Evelyn Alvayero

The application is **GRANTED**.

So Ordered.

 1/4/24